

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**

SONY MUSIC ENTERTAINMENT, *et al.*,

Plaintiffs,

v.

COX COMMUNICATIONS, INC., *et al.*,

Defendants.

Case No. 1:18-cv-00950-LO-JFA

**NOTICE OF SEALED FILINGS**

Pursuant to Rule 26 of the Federal Rules of Civil Procedure, and E.D.Va. Local Civil Rule 5(C), Plaintiffs have filed under seal the following exhibits to the Declaration of Jeffrey M. Gould filed in Support of Plaintiffs' Motion to Compel (ECF No. 177):

- Exhibit 2: Excerpt from the April 5, 2019 Deposition Transcript of Mr. Sanford Mencher
- Exhibit 5: Excerpts from Cox's 2012-2014 Financial Statements
- Exhibit 10: Presentation titled "Education"
- Exhibit 11: Excerpt from the April 25, 2019 Deposition Transcript of Mr. Matthew Carothers
- Exhibit 12: Excerpt from the Rebuttal Expert Report of Dr. Lynne J. Weber, Ph.D.
- Exhibit 13: Excerpt from the June 4, 2019 Deposition Transcript of Mr. Randall Cadenhead
- Exhibit 14: Excerpt from the June 5, 2019 Deposition Transcript of Mr. Brent Beck
- Exhibit 15: Document titled "Abuse Department CBS Ticket Handling Procedures" dated January 17, 2010
- Exhibit 16: Email chain re: "Abuse Issue" dated October 28, 2011
- Exhibit 18: Excerpt from spreadsheet containing CATS ticket data

- Exhibit 27: Excerpt from Dr. Almeroth's Rebuttal Expert Report
- Exhibit 28: Internal Cox e-mail dated May 6, 2014, attaching document titled "What is abuse?"
- Exhibit 29: Document titled "Q&A for Cox DMCA Process"
- Exhibit 30: Excerpt from the May 15, 2019 Deposition Transcript of Mr. Joseph Sikes

**NOTICE OF RIGHT TO RESPOND:** Pursuant to Local Civil Rule 5(C), parties and nonparties may submit memoranda in support of or in opposition to the motion within seven (7) days after the filing of the motion to seal, and that they may designate all or part of such memoranda as confidential.

Dated June 21, 2019

Respectfully Submitted,

/s/ Scott A. Zebrak

Scott A. Zebrak (38729)

Matthew J. Oppenheim (*pro hac vice*)

Jeffrey M. Gould (*pro hac vice*)

OPPENHEIM + ZEBRAK, LLP

4530 Wisconsin Avenue, NW, 5th Floor

Washington, DC 20015

Tel: 202-480-2999

[scott@oandzlaw.com](mailto:scott@oandzlaw.com)

[matt@oandzlaw.com](mailto:matt@oandzlaw.com)

[jeff@oandzlaw.com](mailto:jeff@oandzlaw.com)

*Attorneys for Plaintiffs*